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**SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115**

JOINT APPLICATION OF THE CITY	§	
OF SAN ANTONIO, ACTING BY AND	§	BEFORE THE STATE OFFICE
THROUGH THE CITY PUBLIC	§	
SERVICE BOARD (CPS ENERGY),	§	
AND SOUTH TEXAS ELECTRIC	§	
COOPERATIVE, INC. (STEC) TO	§	OF
AMEND THEIR CERTIFICATES OF	§	
CONVENIENCE AND NECESSITY FOR	§	
THE PROPOSED HOWARD ROAD-TO-	§	
SAN MIGUEL 345-KV TRANSMISSION	§	
LINE IN BEXAR AND ATASCOSA	§	ADMINISTRATIVE HEARINGS
COUNTIES	§	

**CAPITOL AGGREGATES, LTD.’S FIRST REQUEST FOR INFORMATION TO
CPS ENERGY AND SOUTH TEXAS ELECTRIC COOPERATIVE, INC.
QUESTION NOS. CA 1-1 THROUGH CA 1-11**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, CAPITOL AGGREGATES, LTD., (“Capitol Aggregates”) submits this First Request for Information to City Public Service Board (“CPS”) and South Texas Electric Cooperative, Inc. (“STEC”) within the timeframe specified in the procedural schedule in this proceeding.

Capitol Aggregates requests that CPS and STEC provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F). Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy and truth. Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request.

Please provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission’s website and provide notice, by email, to all

other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 57115.

In preparing and submitting its responses, CPS and STEC should observe the following definitions and instructions:

DEFINITIONS

1. “CPS,” “STEC,” the “Company(ies),” and “Applicant(s)” refer to City Public Service Board and South Texas Electric Cooperative, Inc. and any person acting or purporting to act on their behalf, including without limitation, directors, officers, employees, consultants, agents, attorneys, advisors, investigators, representatives, or other persons.

2. “Power,” or “Power Engineers” refer to Power Engineers, Inc. and any person acting or purporting to act on their behalf, including without limitation, directors, officers, employees, consultants, agents, attorneys, advisors, investigators, representatives, or other persons.

3. “Document” and “documents” includes the meaning and scope of its usage in Texas Rule of Civil Procedure 192.3(b), which includes “papers, books, accounts, drawings, graphs, charts, photographs, electronic or videotape recordings, data, and data compilations,” stored in any medium, electronic or otherwise, from which information can be obtained either directly or, if necessary, after translation by CPS and/or STEC into a reasonably usable form. The term specifically includes all forms of electronically stored information (“ESI”), including magnetic data, as provided in Texas Rule of Civil Procedure 196.4.

4. The terms “document” and “documents” are used in their broadest sense to include all written or graphic matter of every kind and description whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include, but are not limited to, writings, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, studies, surveys, statistical compilations, reports, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, calendars, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

5. The terms “document” and “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

6. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of Lone Star or in the custody of its attorneys or other representatives or agents.

7. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

8. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

9. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

10. “Provide the basis” means provide all information on or describe every fact, statistic, inference estimate, consideration, conclusion, study and analysis known to STEC that was relied upon in support of the expressed contention, proposition, conclusion or statement.

11. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

12. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

INSTRUCTIONS

1. Pursuant to Rule 196.4 of the TEXAS RULES OF CIVIL PROCEDURE, Capitol Aggregates, Ltd. specifically requests that any electronic or magnetic data that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Microsoft office software or other “native” applications as applicable and be produced with your response to these requests. If emails are responsive to these requests, please provide a printed copy of the entire email string. Attachments to emails should be printed or, if the attachment is an Excel or similar file, should be provided in native format on CD-ROM or flash drive.

2. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

3. Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

4. If information requested is included in previously furnished exhibits, work papers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-reference.

5. Answer as Information Becomes Available. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

6. Continuing in Nature. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer pursuant to 16 TAC § 22.144(i).

7. Furnish Supporting Data. In answering these questions, furnish all supporting information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.

8. Claim of Privilege. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

9. Claim that Response is Voluminous. Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

10. Claim that Question is Burdensome. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible to discuss the situation and to try to resolve the problem.

11. Claim that Question is Confusing. If any question appears confusing, please request clarification from the undersigned counsel.

12. Claim that Question Seeks Proprietary Information. If you object to any of the questions on the grounds that the question seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

13. For any information you claim is unavailable, state why it is unavailable. If you cannot respond to the request precisely as it is stated, provide any information that is available that would respond to the request at a level of detail different from that specified.

14. If the information requested is in previously furnished exhibits, work papers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please provide references thereto, including Bates Stamp page citations and detailed cross-references.

15. Please produce the requested documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business and organize and label them to correspond to the categories in this request. If any part of a document responds to any request, the whole document is to be produced. If there has been any alteration, modification, or addition to a document, including any marginal notes, handwritten notes, underlining, date stamp, received stamps, attachments, distribution lists, drafts, or revisions, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

16. The singular form of a word shall mean and include the plural. Words used in the plural form of a word shall mean and include the singular.

17. The past tense of a word shall include the present tense and the present tense shall include the past tense.

Dated: October 29, 2024

Respectfully submitted,

BRADY & HAMILTON, LLP

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ATTORNEYS FOR

CAPITOL AGGREGATES, LTD.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties of record, via facsimile, or U.S. mail, electronic mail or e-service on this 29th day of October, 2024.

/s/ Zachary S. Brady

Zachary S. Brady

**SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115**

JOINT APPLICATION OF THE CITY OF SAN ANTONIO, ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY), AND SOUTH TEXAS ELECTRIC COOPERATIVE, INC. (STEC) TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR THE PROPOSED HOWARD ROAD-TO- SAN MIGUEL 345-KV TRANSMISSION LINE IN BEXAR AND ATASCOSA COUNTIES	§ § § § § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CAPITOL AGGREGATES, LTD.'S FIRST REQUEST FOR INFORMATION TO
CPS ENERGY AND SOUTH TEXAS ELECTRIC COOPERATIVE, INC.
QUESTION NOS. CA 1-1 THROUGH CA 1-11**

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|--------|--|
| CA 1-1 | Please provide a complete electronic copy of the Geographical Information System ("GIS") Shapefiles/Geodatabase used by the Applicants and/or their consultant Power Engineers to perform the Environmental Assessment and Routing Study filed with the Application as Attachment 1. |
| CA 1-2 | Please provide a Google Earth .kmz file that has the links, link labels, routes, habitable structures, and substation locations of the proposed project. |
| CA 1-3 | Please provide Table 4-1, the Land Use and Environmental Data for Route Evaluation, of Application Attachment 1 Environmental Assessment and Routing Study, in Microsoft Excel format. |
| CA 1-4 | Please provide Table 4-2, the Land Use and Environmental Data for Segment Evaluation, of Application Attachment 1 Environmental Assessment and Routing Study, in Microsoft Excel format. |
| CA 1-5 | Please provide all workpapers, in complete electronic format, with all formulas and links intact that support the cost estimates for each route as presented in Application Attachment 2. |
| CA 1-6 | Please provide, in electronic format, the type (e.g., tangent, angle, dead-end, etc. for steel monopole, h-frame, lattice, etc. type construction) of structures used on each route and the quantity of each structure type used on the proposed routes. Also, for each structure type provided, please provide a cost estimate of a single structure. |

- CA 1-7 Please provide, in electronic format, the type (e.g., tangent, angle, dead-end, etc. for steel monopole, h-frame, lattice, etc. type construction) of structures used on each segment and the quantity of each structure type used on the proposed segments. Also, for each structure type provided, please provide a cost estimate of a single structure.
- CA 1-8 Provide the data found by route in Table 1 of Attachment 2, Estimated Costs for Transmission Line Facilities, by Segment, for each line segment in the Application, in Microsoft Excel format.
- CA 1-9 Did you adjust the cost estimates for the different routes for known factors, such as road crossings, that may cause increases in costs? If so, identify the conditions that you expect may or will cause cost increases and state how much you estimate each condition may or will increase costs.
- CA 1-10 Please provide the standard easement language to be used in transmission line easements between CPS/STEC and affected landowners.
- CA 1-11 Please provide the following information regarding CPS/STEC's cost estimates in Attachment 2 of the Application:
- a. For right-of-way and land acquisition costs, please provide for each route:
 1. The assumed value per acre of right-of-way (or per linear foot, as applicable) and identify the value that was assumed for each segment of each route;
 2. The amount of ROW per link for which an easement will be required;
 3. Any incidental costs included in the total cost estimate, such as legal fees;
 4. Any assumptions concerning what percentage of ROW will be acquired through condemnation;
 5. The back-up documentation for each component included in the total cost for each route;
 - b. For the Engineering and Design Cost estimates, please describe what work will be performed by the utility and what work will be performed by the contractor(s).